

Andrew T. Solomon (AS 9200)
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
PROFESSIONAL OFFSHORE	:	
OPPORTUNITY FUND, LTD., a company	:	08-CIV-3767 (DC)
registered under the laws of the British	:	
Virgin Islands,	:	<u>NOTICE OF MOTION</u>
	:	
Plaintiff,	:	
	:	
-against-	:	ECF CASE
	:	
FRANKLIN TOWERS ENTERPRISES,	:	
INC., a Nevada corporation,	:	
	:	
Defendant.	:	
-----	X	

PLEASE TAKE NOTICE THAT plaintiff Professional Offshore Opportunity Fund, Ltd. by its undersigned counsel, Sullivan & Worcester LLP, moves this Court for entry of default judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure against defendant Franklin Towers Enterprises, Inc.

PLEASE TAKE FURTHER NOTICE THAT plaintiff submits a memorandum of law and the Declaration of Andrew T. Solomon in support of its motion.

PLEASE TAKE FURTHER NOTICE THAT plaintiff also submits a proposed default judgment.

PLEASE TAKE FUTHER NOTICE THAT plaintiff served this motion by overnight courier on defendant and its counsel, David Lubin and Associates at 26 East Hawthorne Avenue, Valley Stream, NY 11580.

Dated: New York, New York
June 30, 2008

SULLIVAN & WORCESTER LLP

By: s/ Gretchen Silver
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*Attorneys for Plaintiff Professional Offshore
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